

Alan M. Klein, State Bar No. 92785
LAW OFFICE OF ALAN M. KLEIN CORP.
16311 Ventura Boulevard, Suite 1200
Encino, California 91436
Telephone: (818) 986-3141
Facsimile: (818) 986-8141

Attorney for Defendant Life and Style Fashions, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNITED FABRICS)	Case No. 2:15-CV-5733-ODW-E
INTERNATIONAL, INC.,)	
a California Corporation,)	
Plaintiff,)	DECLARATION OF
)	ALAN KLEIN IN SUPPORT OF
)	ALAN M. KLEIN'S MOTION FOR
vs.)	LEAVE TO WITHDRAW AS
)	COUNSEL FOR DEFENDANT LIFE
)	AND STYLE FASHIONS, INC.
LIFE N STYLE FASHIONS, INC., a)	
New York Corporation; SECOND)	Judge: Hon. Otis D. Wright II
SKIN LLC; and DOES 1 through 10,)	Room: 11
Defendant.)	Date: August 22, 2016
)	Time: 1:30 p.m.
)	
)	

I, Alan M. Klein, declare as follows:

1. I am an attorney at law duly licensed to practice in the State of California. I am an attorney at the Law Office of Alan M. Klein Corp. ("Law Office of Alan M. Klein"), attorney of record for defendant Life and Style Fashions, Inc. ("Life and Style") herein. I am serving as counsel for Life and Style based on my relationship with Miskin & Tsui-Yip LLP ("Miskin & Tsui-Yip"), a New York law firm that represented Life and Style for its intellectual property matters. I have personal knowledge of the matters set forth in this declaration and,

DECLARATION OF ALAN KLEIN IN SUPPORT OF ALAN M. KLEIN'S MOTION FOR
 LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANT LIFE AND STYLE
 FASHIONS, INC.

1 if called and sworn as a witness, I could and would testify competently thereto
2 under oath.

3 2. On or about September 17, 2015, my firm was retained by Miskin &
4 Tsui-Yip to serve as counsel for this action on behalf of Life and Style.

5 3. I bill Miskin & Tsui-Yip for the costs and fees of my work in
6 connection with this action.

7 4. I have no direct contact with Life and Style. All communication
8 relating to this action has been between Miskin & Tsui-Yip and Life and Style, or
9 otherwise provided to me via Miskin & Tsui-Yip.

10 5. I have received copies of letters and e-mails from Miskin & Tsui-Yip
11 addressed to Life and Style requesting information and instructions from Life and
12 Style integral to the defense of Life and Style in this action. Upon information and
13 belief, Life and Style has never replied to these letters and e-mails.

14 6. On or about [INSERT DATE], I was informed by Miskin & Tsui-Yip
15 of its decision to withdraw as counsel for Life and Style, due to lack of payment,
16 lack of communication, and total breakdown in the attorney-client relationship that
17 made it impossible for Miskin & Tsui-Yip to properly represent Life and Style.

18 7. Since I have no direct contact with Life and Style, I would be unable
19 to continue to represent Life and Style under Rule 1.1 and Rule 1.16 of the ABA
20 Rules of Professional Conduct.

21 I declare under penalty of perjury under the laws of the United States of
22 America that the foregoing is true and correct. Executed this 20th day of July,
23 2016, at Encino, California.

24
25 */S/ Alan M. Klein*

26 Alan M. Klein

27 DECLARATION OF ALAN KLEIN IN SUPPORT OF ALAN M. KLEIN'S MOTION FOR
28 LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANT LIFE AND STYLE
FASHIONS, INC.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to this action and a member of the bar of this court. My business address is 16311 Ventura Blvd., Suite 1200, Encino, California 91436.

I hereby declare that on July 20, 2016, a copy of the foregoing document was filed with the United States District Court for the Central District of California in accordance with its Electronic Case Filing (ECF) procedures and served upon the attorneys of record for the parties to this action through ECF via e-mail through ECF to:

Stephen M. Doniger, Esq.
Scott A. Burroughs, Esq.
Trevor W. Barrett, Esq.
DONIGER / BURROUGHS
603 Rose Avenue
Venice, California 90291

Attorneys for United Fabrics
International, Inc.

I also, on said date, mailed a copy of the foregoing document, by first class mail, with postage pre-paid, addressed to:

Sunny Kakar, Vice President
Life N Style Fashions, Inc.
1400 Broadway, Suite 815
New York NY 10018

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct. Executed this 20th day of July, 2016, at Los Angeles, California.

/S/ Alan M. Klein

Alan M. Klein

DECLARATION OF ALAN KLEIN IN SUPPORT OF ALAN M. KLEIN'S MOTION FOR
LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANT LIFE AND STYLE
FASHIONS, INC.